

#7 1539  
UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Solomon White  
Plaintiff

12-1790  
NO \_\_\_\_\_

VS

PLAINTIFF'S  
COMPLAINT

Meyer Unkovic & Scott, LLP  
Defendant

FILED ON BEHALF  
OF THE PLAINTIFF  
SOLOMON WHITE  
Per Se

VS

Brandon B. Rohey  
Defendant

SOLOMON WHITE  
9200 VANTINE STREET  
Pittsburgh, PA 15235  
412-242-7116

## Complaint

### I. Introduction

1. This is an action for damages brought by an individual consumer for Defendants violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et. seq (hereafter "FDCPA") which prohibit debt collectors from engaging in abusive, deceptive and unfair practices.

### II. Jurisdiction and Venue

2. Jurisdiction of this court arises under 15 U.S.C. § 1692 and K(d) 28 U.S.C. § 1337. Declaratory relief is available pursuant to 28 U.S.C. § 2201 and 2202. Venue is proper in this district in that the defendants transact business here and the conduct complained of occurred here

### III. Parties

3. Plaintiff, Solomon White is a natural person residing at 9200 Vantine Street, Pittsburgh, PA. 15235

4. Meyer Unkovic & Scott LLP, Defendant is a corporation engaged in the business of collecting debts in this state with its principal place of business located at 535 Smithfield Street, Suite 1300, Pittsburgh, PA. 15222-2315

A purpose of defendant Meyer Unkovic & Scott LLP is the collection of debts using the mails and defendant Meyer Unkovic & Scott LLP regularly attempts to collect debts alleged to be due another

5. Defendant, Brandon B. Rothey is a natural person employed by Defendant Meyer Unkovic & Scott LLP as a collector at all times relevant to this complaint
6. Defendants are "debt collectors" as defined by the FD-CPA, 15 U.S.C. § 1692 a(6)
7. Defendant, Brandon B. Rothey business address is 535 Smithfield Street, Suite 1300, Pittsburgh, PA. 15222-2315

### Factual Allegations

8. By correspondence on the letterhead of Meyer, Unkovic & Scott LLP dated October 25, 2011 and December 7, 2011, Jewish Association on Aging mailed a collection letter over the typewritten name of Brandon Rothey to Solomon White demanding payment of a debt in the amount of \$5,468.12 allegedly due Jewish Association on Aging. A copy is attached here to A Exhibit A.
9. Exhibit A was received by Mr. White at his residence in Pittsburgh, PA.
10. Exhibit A stated "within the next 10 days you are requested to contact this office concerning payment"

10. On or about November 19, 2011 Plaintiff wrote requesting Defendants to verify alleged debt

12. On or about November 21, 2011, December 14, 2011 and January, 2012 collection letters continued after plaintiff requested verification

13. On or about December 7, 2011 defendants mailed a letter to Plaintiff again requesting payment ignoring the verification letter of plaintiff. Defendant requesting payment in 10 days.

14. After December 19, 2011 defendants mailed statements to Plaintiff

15. Defendants appeared before the Court of Common Pleas Allegheny County, October 2012, stating the Pennsylvania Department of Welfare stated plaintiff allegedly owed \$5,468.12

16. No paperwork from the Pennsylvania Department of Welfare was presented

## CLAIM FOR RELIEF COUNT I

17 Plaintiff repeats and realleges and incorporates by reference to the foregoing paragraphs.

18 Defendants violated the FDCPA. Defendants violations include, but not limited to, the following:

(a) The Defendants violated 15 U.S.C. § 1692(e) 11 by not stating in all communications indicate they are from a debt collector

(b) The Defendants violated 15 U.S.C. § 1692(g) because the demand for payment overshadowed or created confusion about the disclosure of the consumer rights in the validation notice

(c) The Defendants violated 15 U.S.C. § 1692(g) after plaintiff made a timely validation request, defendants continued collection activities

(d) THE Defendants violated 15 U.S.C. § 1692(e)(2) because letters contained a false impression of the character, amount, or legal status of the alleged debt

(e) THE Defendants violated 15 U.S.C. § 1692(f)(1) attempted to collect amount not authorized by the agreement creating the debt

(f) THE Defendants violated 15 U.S.C. § 1692(f) by causing charges to be made to plaintiff

(G) The Defendants violated 15 U.S.C. § 1692 f by using unfair and unconscionable means to Attempt to collect alleged debt

(H) The Defendants violated 15 U.S.C. § 1692 k by causing out of pocket expenses to Plaintiff

(I) The Defendants violated 15 U.S.C. § 1692 by using a letterHEAD from Law firm that can imply a threat to a Consumer

## COUNT II

19 All of above paragraphs relevant are incorporated by reference

20 The Defendants appeared before Court of Common Pleas of Allegheny County in October 2012 stating the Pennsylvania Department of Welfare Requested plaintiff owed \$ 5,468.12

21 No paperwork from Department of Welfare was present -d

22 The Defendants misrepresented the amount of the alleged debt with illegal charges and legal fees.

23 The Defendants actions added about \$5,000 in bogus additional legal costs which were denied.

24 Defendants therefore committed a fraud upon the plaintiff.

iff, as well as upon the Court of Common Pleas of Allegany County by stating Debt was from Department of Welfare

25 Defendants have violated § 1692d and 1692f

26 Defendants actions amount to common law fraud upon the plaintiff

27 Defendants actions in this case were malicious, fraudulent and outrageous and hence entitle the plaintiff to punitive damages.

28 Defendants actions herein have subjected plaintiff to humiliation and embarrassment

Wherefore, plaintiff Solomon White respectfully requests that judgement be entered against defendants Meyer, Urkovic & Scott LLP and Brandon B. Rothery for the following

A. Declaratory judgement that the defendants conduct violated the FD CPA

B. Actual Damages

C. Statutory damages pursuant to 15 U.S.C. § 1692-k

D. Punitive Damages

E. For such other and further relief as the court may deem just and proper

Respectfully submitted

NO DEMAND FOR JURY  
TRIAL

Please take notice that plaintiff Solomon White do  
NOT demand a trial by jury in this action

Solomon White  
Pro Se



UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA

Solomon White  
Plaintiff

VS

Meyer Unkovic & Scott LLP  
Defendant

VS

Brandon B. Rothey  
Defendant

Certificate of Service

I, Solomon White, hereby certify that the Complaint was served upon the Defendants Meyer Unkovic & Scott LLP, 535 Smithfield Street Pittsburgh, Penna. 15222-2315 AND Mr. Brandon B. Rothey, 535 Smithfield Street, Pittsburgh, PA.

15222-2315 by certified First Class Mail,  
Return Receipt Requested on this day Friday, Dec-  
ember 7, 2012

Sincerely

Solomon White,  
Pro Se